



USDC SDNY  
DOCUMENT  
ELECTRONICALLY FILED  
DOC #: \_\_\_\_\_  
DATE FILED: 2/8/2016

ZACHARY W. CARTER  
*Corporation Counsel*

THE CITY OF NEW YORK  
LAW DEPARTMENT  
100 CHURCH STREET  
NEW YORK, NY 10007

GARY MOY  
*Senior Counsel*  
Phone: (212) 356-3522  
Fax: (212) 356-3509  
gmoy@law.nyc.gov

February 5, 2016

**Via ECF & EMAIL**

Honorable Analisa Torres  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, New York 10007  
[Torres\\_NYSDChambers@nysd.uscourts.gov](mailto:Torres_NYSDChambers@nysd.uscourts.gov)

Re: George Packard, et al. v. City of New York, et al.,  
15 Civ. 7130 (AT) (SDNY)

Your Honor:

I am a Senior Counsel in the office of Zachary W. Carter, Corporation Counsel of the City of New York, and the attorney newly assigned to the defense of the above-referenced matter. The undersigned writes to respectfully request a two week extension of the briefing schedule set forth in undocketed entry dated January 21, 2016.

By way of background, on January 14, 2016, defendants filed a request for a pre-motion conference regarding a proposed motion to dismiss pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure. (Docket Entry No. 28) On January 21, 2016, the Court issued the following briefing schedule: motions due by February 18, 2016; responses due by March 17, 2016; and replies due by March 31, 2016. Plaintiffs' counsel, Stecklow & Thompson, do not consent to this request given that they have previously consented to defendants' requests for an extension of time to answer or otherwise respond to the complaint. The undersigned respectfully requests a brief two week extension of the briefing schedule because the undersigned was recently assigned to this case and will be the principal attorney who will be attending to day-to-day matters on this action and drafting the Rule 12(b)(6) motion papers. This request is necessitated because the undersigned needs additional time to transition to this case and to attend to other deadlines and commitments that were scheduled prior to the undersigned's assignment to this case.

Thank you for your consideration herein.

Respectfully submitted,

/s/  
Gary Moy  
*Senior Counsel*

cc: **VIA ECF & EMAIL**

Jeffrey G. Smith, Esq.  
Janine L. Pollack, Esq.  
Kevin G. Cooper, Esq.  
Wolf Haldenstein Adler Freeman & Herz LLP  
270 Madison Avenue  
New York, New York 10016

Wylie M. Stecklow, Esq.  
David A Thompson, Esq.  
Stecklow & Thompson  
217 Centre Street, 6<sup>th</sup> Floor  
New York, New York 10013

DENIED.

SO ORDERED.

Dated: February 8, 2016  
New York, New York

---



ANALISA TORRES  
United States District Judge